

SRI v. ISS and Symantec

Exhibit 20 to the Proposed Pre-Trial Order

PROPOSED VOIR DIRE PURSUANT TO LR 47.1

Pursuant to LR 47.1, SRI respectfully submits its proposed voir dire to the jury panel.

Proposed Voir Dire to Jury Panel

Good morning, ladies and gentlemen. I am Judge Robinson, and I will be presiding over the trial for which a jury is about to be drawn in the case captioned *SRI International, Inc. v. Internet Security Systems, Inc. and Symantec Corporation*. Briefly stated, this case is a civil action brought by Plaintiff SRI International against two Defendants, Symantec Corporation and Internet Security Systems, Inc.

The trial is expected to last from _____; our trial days will run approximately from _____ a.m. to _____ p.m.

SRI is represented by Frank Scherkenbach, an attorney with Fish & Richardson P.C. Symantec is represented by Lloyd Day, an attorney with Day Casebeer Madrid and Batchelder, LLP. Internet Security Systems, Inc. is represented by Holmes Hawkins an attorney with King & Spaulding LLP.

In the light of this brief summary, I will ask the panel certain questions, the purpose of which is to: (1) enable the court to determine whether or not any prospective juror should be excused for cause; and (2) enable counsel for the parties to exercise their individual judgment with respect to peremptory challenges, that is, challenges for which no reason need be given by counsel. If any of you answer any question “yes,” please stand up and, upon being recognized by the court, state your juror number. When I have concluded asking all the questions, we will

call you to the bench individually to speak with you about your affirmative response or responses.

ASK CLERK TO ADMINISTER THE OATH TO THE PANEL

1. Does any member of the panel know any officer, director, or employee of, or ever worked for or done business with SRI International, Inc.?
2. Does any member of the panel know any officer, director, or employee of, or ever worked for or done business with Symantec Corporation?
3. Does any member of the panel know any officer, director, or employee of, or ever worked for or done business with Internet Security Systems, Inc. also known as ISS?
4. Does any member of the panel know any officer, director, or employee of, or ever worked for or done business with International Business Machine Corporation or IBM?
5. Has any member of the panel ever owned stock in Symantec Corporation?
6. Has any member of the panel ever owned stock in Internet Security Systems, Inc.?
7. Has any member of the panel ever owned stock in IBM?
8. Has any member of the panel heard of, or ever been represented by any of the following law firm or lawyers who represent SRI International, Inc. in this case?

Fish & Richardson P.C.

Frank Scherkenbach
Howard Pollack
John Farrell
Todd Miller
Katherine Prescott
John Horvath

9. Has any member of the panel heard of or ever been represented by any of the following law firms or lawyers who represent Symantec Corporation in this case?

Day Casebeer Madrid & Batchelder

Attorneys to be listed by defendants

Morris, James, Hitchens & Williams

Attorneys to be listed by defendants

10. Has any member of the panel heard of or ever been represented by any of the following law firms or lawyers who represent Internet Security Systems, Inc. in this case?

King & Spalding

Attorneys to be listed by defendants

Potter, Anderson & Corroon

Attorneys to be listed by defendants

11. Is any member of the panel related to or do you know of any of the following individuals who might appear as witnesses in this case:

Phillip Porras
Alfonso Valdes
Patrick Lincoln
George Kesidis
Bernard Palmer
Paul Griswold
Jim Pruss
Robert McEwin
Peter Tosto
Holly Stewart
Jeremy Bennett
Brian Hernacki
Paul Agbabian
William Luk
Mark Bagley
Howard Lev
Edward Taranto
Grant Geyer
Rogert Geiger
Robert Allen
Robert Ferrill
Douglas Song
Keith Skinner
Richard Abramson
Michael Skroch
Y. Frank Jou
Theresa Lunt
Carl Wright
Col. Timothy Gibson

Thomas Noonan
Robert Graham
Jim Innes
Joe Kleinwaechter
Sandeep Kumar
Enrique Salem¹

12. Does any member of the panel have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?
13. Has any member of the panel ever been a plaintiff or a defendant in a civil lawsuit?
14. Has any member of the panel ever served as a juror in a lawsuit?
15. Does any member of the panel have a college or advanced degree in a scientific discipline?
16. Does any member of the panel use a computer?
17. Does any member of the panel have any training, experience with, or knowledge of, the law or patents, computer networking, computer network administration, computer network security, computer intrusion detection?
18. Has any member of the panel been employed by a company in the computer networking or network security business?
19. Does any member of the panel have any special disability or problem that would make it difficult or impossible for them to serve as a member of the jury in this case?
20. Is any member of the panel employed by a company involved in a high-tech industry?
21. Has any member of the panel been employed by a public safety agency, such as a fire or police department?
22. Has any member of the panel ever served in the military?
23. Has any member of the panel worked for a government agency?
24. Has any member of the panel, a family member, or close personal friend ever had any dealings with patents or with the United States Patent and Trademark Office?
25. Does any member of the panel have any training or experience with sales and marketing, or advertising?

¹ The listed witnesses do not include witnesses who may be identified by either defendant.

26. Have any member of the panel had your deposition taken or testified in a legal or administrative proceeding?
27. Has any member of the panel or a close relative or friend invented anything?
28. Has any member of the panel or a close relative or friend attempted to obtain a patent?
29. Has any member of the panel worked for a company that owns patents, or applied for patents?
30. Does any member of the panel have any strong feelings about patents or the process by which patents are obtained?
31. Does any member of the panel know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence any instructions as to the law?